

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI

UNITED STATES DISTRICT COURT

for the

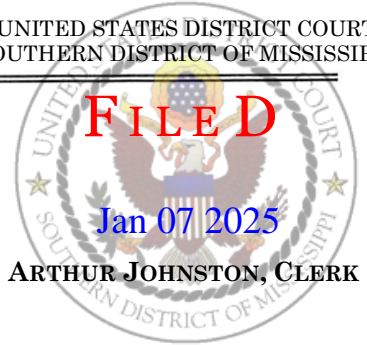
Southern District of Mississippi

United States of America)

v.)

SEAN PAROL)

Case No. 1:25-mj-507)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 6, 2024 in the county of Harrison in the
Southern District of MS, Southern Division, the defendant(s) violated:

Code Section

18 U.S.C. § 2251(a)

Offense Description

Defendant produced a video on or about April 6, 2024, of himself and a minor
engaging in sexually explicit conduct, all in violation of 18 U.S.C. § 2251(a).

This criminal complaint is based on these facts:

See affidavit attached hereto and incorporated herein

☒ Continued on the attached sheet.

Complainant's signature

Hillary Ladner, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 1-7-2025
*Judge's signature*City and state: Gulfport, MS

Robert P. Myers, Jr., United States Magistrate Judge

Printed name and title

Affidavit for Criminal Complaint

I, Hillary Ladner, being first duly sworn, hereby depose and state as follows:

Your affiant is a Special Agent (SA) of the Federal Bureau of Investigation, in Gulfport, Mississippi (FBI Gulfport). I have been employed as a Special Agent with the FBI since April 2021. I primarily investigate federal crimes related to the sexual exploitation and sexual abuse of children. I have gained experience through training in seminars, classes, and everyday work related to conducting these types of investigations. I have been involved in numerous investigations involving violent crimes against children, child exploitation, the production of child sex abuse materials and human trafficking, to include leading investigations related to internet crimes involving children, writing and executing search warrants, interviewing victims, interviewing suspects, and conducting arrests. I am authorized to investigate violations of laws of the United States with authority to execute warrants issued under the authority of the United States

This Affidavit is made in support of an application for the issuance of an arrest warrant for Sean PAROL for a violation of 18 U.S.C. Section 2251(a) (Any person who employs, uses, persuades, induces, entices, or coerces any minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct). The FBI began investigating PAROL after he was identified as sexually abusing male juveniles, hereinafter referred to as L.S. and A.H., in Harrison County, Mississippi.

The purpose of this application is to arrest PAROL based on probable cause to believe that he violated the provisions of law contained within 18 U.S.C. Section 2251(a), which among other things, makes it a crime for anyone to employ, use, persuade, induce, entice, or coerce any minor to engage in sexually explicit conduct for the purpose of producing one or more visual depiction, or transmitting a live visual depiction, of such conduct, or attempting to do so, and such visual

depictions were produced using materials that had been mailed, shipped, and transported, in and affecting interstate and foreign commerce by any means, including by computer.

I am familiar with the information contained in this Affidavit based upon the investigation I have personally conducted and based on my conversations and information provided by other law enforcement officers involved in this investigation.

Because this Affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause to believe that evidence of violations of 18 U.S.C. Section 2251(a).

STATEMENT OF PROBABLE CAUSE

On December 6, 2024, a parent of A.H. visited the D'Iberville Police Department to report that her minor son (age 12) was being sexually abused by PAROL. On December 17, 2024, a forensic interview was conducted with A.H. in which he disclosed PAROL had been sexually abusing him for the past few years and would do while other juveniles were present at PAROL's house in Harrison County, in the Southern Division of the Southern District of Mississippi.

Also, on December 6, 2024, investigators with the D'Iberville Police Department met with the parents of L.S. (age 11). They relayed to investigators that L.S. disclosed PAROL had been sexually abusing him in exchange for vapes. On December 18, 2024, a forensic interview was conducted with L.S. in which he disclosed PAROL had been sexually abusing him to include PAROL performing oral sex on him and attempting to penetrate his anus. On one particular occasion, L.S. noticed a camera on a tripod in PAROL's bedroom that was recording the sexual abuse.

On December 19, 2024, PAROL was arrested by the D'Iberville Police Department at the Gulfport-Biloxi International Airport. During a search incident to arrest, a Samsung cellphone, an Apple iPhone, and a laptop were recovered from PAROL.

On December 20, 2024, a search warrant was executed on PAROL's residence. Inside of the residence, officers located hidden cameras in the bathrooms and living room, multiple cell phones, multiple hard drives, and multiple SD cards.

As of the time of this affidavit, the FBI has a voluminous amount of child pornography on PAROL's devices to include multiple videos of PAROL sexually abusing A.H. and L.S. that PAROL produced. In particular for this affidavit, there was a file found on an MCI GE65 Raider Laptop, serial number K2001N0051533 titled, "NGRF5456-trip.mp4", which was created on April 6, 2024. The video shows two prepubescent boys, A.H. and L.S., naked in a bathtub with numerous sex toys and a tablet hanging on the wall playing what appears to be porn. PAROL is seen adjusting the tablet for the boys.

At approximately the 24-minute mark, L.S. is standing outside of the bathtub with only a towel on his back. PAROL, having no pants on and an erect penis, kneels in front of the minor boy and performs oral sex on him. During the video, PAROL is seen moving the towel in an apparent attempt to make sure the video captures him giving oral sex to the minor. The video is approximately 46 minutes and 47 seconds in length.

CONCLUSION

Based on the above information, there is probable cause to believe that Title 18 United States Code Section 2251(a), which, among other things, make it a federal crime for any person who employs, uses, persuades, induces, entices, or coerces any minor to engage in, or who has a

minor assist any other person to engage in, with the intent that such minor engage in, any sexually explicit conduct for the purpose of producing any visual depiction of such conduct or for the purpose of transmitting a live visual depiction of such conduct, have been committed by Sean PAROL.

Based upon the foregoing, this Affiant respectfully requests that this Court issue an arrest warrant for Sean PAROL based on the foregoing statements.



Special Agent Hillary Ladner
Federal Bureau of Investigation

Subscribed and sworn Before me this 7th of January 2025.


UNITED STATES MAGISTRATE JUDGE